

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

- against -

STANFORD INTERNATIONAL BANK,
LTD, *et al.*,

Defendants.

Civil Action No. 3:09-cv-00298-N
Judge David C. Godbey

IN RE: STANFORD ENTITIES
SECURITIES LITIGATION

MDL: 2099

**AGREED MOTION TO DISTRIBUTE CHADBOURNE NOTICE OF SETTLEMENT
AND BAR ORDER PROCEEDINGS VIA ECF**

TO THE HONORABLE COURT:

COME NOW Receiver Ralph S. Janvey, in his capacity as the Court-appointed Receiver for the Stanford Receivership Estate (the “Receiver”), the Official Stanford Investors Committee (the “Committee”), and Samuel Troice, Pam Reed, Horacio Mendez, Annalisa Mendez, and Punga Punga Financial, Ltd., individually and, in the case of Pam Reed, Samuel Troice, and Punga Punga Financial, Ltd., on behalf of a putative class of Stanford investors (collectively, the “Investor Plaintiffs,” and with the Receiver and the Committee, the “Plaintiffs”) (collectively, “Movants”) and file this Agreed Motion to Distribute Chadbourne Notice of Settlement and Bar Order Proceedings via ECF, and in support thereof would respectfully show the Court the following:

1. On April 20, 2016, Movants filed their Expedited Request for Entry of Scheduling Order and Motion to Approve Proposed Settlement with Chadbourne & Parke, LLP, to Enter the Bar Order, to Enter the Final Judgment and Bar Order, and for Plaintiffs' Attorneys' Fees and Expenses and Brief in Support (the "Motion to Approve") [Doc. 2300] in Civil Action No. 3:09-CV-00298-N, pending in the United States District Court for the Northern District of Texas (the "SEC Case"). On May 9, 2016, the Court entered the Scheduling Order [Doc. 2305] in the SEC Case.

2. Pursuant to the Scheduling Order, on or before May 31, 2016, the Receiver is required to "cause the Notice to be distributed by ECF to all parties to and persons who have entered an appearance in any case included in MDL No. 2099, *In re: Stanford Entities Securities Litigation* (N.D. Tex.)" (the "MDL"). See Doc. 2305, at pg. 4.

3. Movants request the Court to permit the Clerk to file Notice, attached as Exhibit A, via ECF in the MDL and in all cases included in the MDL. Counsel for Chadbourne & Parke, LLP agree to this Motion.

Date: May 31, 2016.

Respectfully submitted,

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COUNSEL FOR THE PLAINTIFFS

CERTIFICATE OF SERVICE

On May 31, 2016, I electronically submitted the foregoing document with the clerk of the court of the U.S. District Court, Northern District of Texas, using the electronic case filing system of the Court. All parties who have appeared in this proceeding will be served via ECF.

I further certify that on May 31, 2016, I served a true and correct copy of the foregoing document via United States Postal Certified Mail, Return Receipt required to the persons noticed below who are non-CM/ECF participants:

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/s/ Edward C. Snyder
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